

REMARKS

A. DRAWINGS

In the Office Action, the Examiner objected to Figure 6 for failing to comply with 37 CFR § 1.84(p)(5) because the reference numbers 66a and 66d were not mentioned in the specification. The drawing was also objected to because Figure 6 included reference number 66 which was not mentioned in the specification.

In the specification, the paragraphs [0044] and [0046] have been amended to correct minor editorial problems. Paragraph [0044] was amended to change the term, “push-to-talk session manager 66a” to “push-to-talk server 66.” Paragraph [0046] was amended to change the term “push-to-talk media processor 66d” to “push-to-talk server 66.” Based upon these amendments to the specification, the applicants submits that the drawings now comply with the requirements of 37 CFR § 1.84(p)(5) and amendments to the drawings are no longer required.

B. CLAIMS

Claims 1-3, 5-29, 32-49 remain pending. By this response, claims 1, 12, 13, 17, 21, 29 and 43 are currently amended. Claims 50-65 were cancelled in the previous election requirement and claims 4 and 30-31 are currently cancelled. No new claims have been added.

1. Claim Objections Under 37 CFR §1.75(d)(1)

Claims 12-13, 17 and 21 were objected to under 37 CFR § 1.75(d) due to a lack of antecedent basis. Claim 12 was amended to add change the term “the push-to-talk clients” to “the clients, wherein the clients are push-to-talk clients.” Claim 13 depends from claim 12 and was amended to change the term “the push-to-talk clients” to “the clients.” Claim 17 was amended to change the term “the plurality of clients” to “the plurality of clients, wherein the clients are push-to-talk clients.” Claim 21 was amended to change the term, “push-to-talk clients” to “the clients, wherein the clients are push-to-talk clients.”

The applicant thanks the Examiner for the suggested claim amendments and requests that the claim objections under 37 CFR §1.75(d)(1) be removed.

2. Response To Claim Rejections Under 35 USC §102(b) As Being Anticipated By Gallant

Claims 1, 16, 24-26, 29, 37-38 and 42 were rejected under 35 USC §102(b) as being anticipated by Gallant (US 2002/0165969 A1). It is respectfully submitted that claims 1, 16, 24-26, 29, 37-38 and 42 as amended are not anticipated by Gallant.

Claim 1 was amended to add the limitations, “at least some of the plurality of clients each have a SIP uniform resource identifier and a telecommunications uniform resource identifier” and “wherein, the SIP proxy receipts the communications from the plurality of clients and determines if the communications uses the SIP uniform resource identifier or the telecommunications uniform resource identifier.” This limitation is disclosed by the pending application at page 6, paragraph 0032. The applicant submits that the limitation of the clients each having a SIP uniform resource identifier and a telecommunications uniform resource identifier is not disclosed or suggested by Gallant.

Claim 4 depends from claim 1 and adds the limitation that, “one of the plurality of differing user identifiers comprises an identifier having a standard SIP uniform resource identifier format and wherein another of the plurality of differing user identifier comprises an identifier having a standard telecommunications uniform resource identifier format.” Claim 4 was rejected in the Office Action under 35 USC §103(a) as being unpatentable over Gallant in view of Kallio (US Patent Publication 2004/0190498 A1). The Examiner argued that Kallio teaches differing identifiers, SIP URI and TEL URI. (Office Action page 7.)

The applicant submits that Kallio discloses a system in which a single communications connection between an internet protocol IP network and a circuit-switched network such as a Global System for Mobile Communications (GSM) network. Kallio discloses that the communications path includes a first leg through a circuit switched network and a second leg through an IP based network. The communications are transmitted from a circuit switched device through the switched network and through the IP network to the IP communications

device. Since Kallio only discloses a mixed circuit switched network leg and IP network leg, the applicant submits that Kallio does not disclose a SIP uniform resource identifier defining a first communication routing or a telecommunications uniform resource identifier defining a second communication routing. Because the communications devices disclosed in Kallio are coupled to their corresponding circuit switched or IP networks, there is no need for the system to determine a type of communications uniform resource identifier being used.

In the Office Action, the Examiner states that Gallant does not explicitly disclose that the differing identifiers have a SIP URI format and a TEL URI format. (Office Action, Page 7.) Thus, Gallant also does not disclose, a SIP uniform resource identifier defining a first communication routing or a telecommunications uniform resource identifier defining a second communication routing. For these reasons, the applicant submits that the combination of Gallant and Kallio do not disclose all limitations of claim 1. Claims 16 and 24-26 depend from claim 1 and for these same reasons, the cited prior art references do not disclose or suggest all limitations. Applicant respectfully submits that Gallant does not anticipate pending claims 1, 16 and 24-26. Applicant further submits that claims 1, 16 and 24-26 are not obvious over Gallant in view of Kallio. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

Claim 29 was amended to include the limitations of at least one of the plurality of clients has at least a SIP uniform resource identifier and a telecommunications uniform resource identifier by which to identify itself, when receiving a SIP communication from the at least one of the plurality of clients that uses a SIP uniform resource identifier, automatically facilitating the SIP communication for that client; when receiving a telecommunications communication from the at least one of the plurality of clients that uses the telecommunications uniform resource identifier, automatically facilitating the telecommunications communication for that client. As discussed above in claim 1, the system disclosed by Kallio discloses a system which transmits communications through a two leg communications path. There is no disclosure in the cited references regarding the facilitation of the different types of communications by a SIP proxy. For these reasons, the applicant submits that Gallant and Kallio do not disclose or suggest all limitations of claim 29. Claims 37 – 38 and 42 depend from claim 29 and for these same reasons, the cited prior art references do not disclose all limitations. Applicant respectfully

submits that Gallant does not anticipate pending claims 29, 37 – 38 and 42. Applicant further submits that claims 29, 37 – 38 and 42 are not obvious over Gallant in view of Kallio. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

3. Response To Claim Rejections Under 35 USC §103(a) As Being Obvious Over Gallant In View Of Kallio

Claims 4, 30 and 31 were rejected under 35 USC § 103(a) as being obvious over Gallant and further in view of Kallio. Claims 4, 30 and 31 were cancelled. Claim 1 was amended to include the limitations of claim 4 and claim 29 was amended to include the limitations of claims 30 and 31.

4. Response To Claim Rejections Under 35 USC §103(a) As Being Obvious Over Gallant In View Of Denman

Claims 3, 5, 11-14, 17-23, 27 34-36, 39-41 and 43-49 were rejected under 35 USC § 103(a) as being unpatentable over Gallant in view of Denman (US Patent No. 7, 170,863). Examiner states that the added limitations of these pending claims regarding push-to-talk and SIP compression are disclosed by Denman. (Office Action, Page 8.) Claims 3, 5, 11-14, 17-23 and 27 depend from claim 1. As discussed above, claim 1 includes the limitations “at least some of the plurality of clients each have a SIP uniform resource identifier and a telecommunications uniform resource identifier” and “wherein, the SIP proxy receipts the communications from the plurality of clients and determines if the communications uses the SIP uniform resource identifier or the telecommunications uniform resource identifier.” The applicant submits that these limitations are not disclosed or suggested by Denman and that claims 3, 5, 11-14, 17-23 and 27 are not obvious over Gallant in view of Denman. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

Claims 34-36 and 39-41 depend from claim 29. As discussed above, claim 29 includes the limitations of at least one of the plurality of clients has at least a SIP uniform resource identifier and a telecommunications uniform resource identifier by which to identify itself, when

receiving a SIP communication from the at least one of the plurality of clients that uses a SIP uniform resource identifier, automatically facilitating the SIP communication for that client; when receiving a telecommunications communication from the at least one of the plurality of clients that uses the telecommunications uniform resource identifier, automatically facilitating the telecommunications communication for that client. The applicant submits that these limitations are not disclosed or suggested by Denman and therefore claims 3, 5, 11-14, 17-23 and 27 are not obvious over Gallant in view of Denman. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

Claims 44-49 depend from claim 43. Claim 43 was amended to include the limitation, "SIP proxy containing a SIP uniform resource identifier and a telecommunications uniform resource identifier for the push-to-talk client." As discussed above with respect to claims 1 these limitations are not disclosed by Gallant and as discussed above with respect to claims 3, 5, 11-14, 17-23 and 27, these limitations are not disclosed by Denman. Thus, applicant submits that these limitations are not disclosed or suggested by Denman and therefore claims 44-49 are not obvious over Gallant in view of Denman. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

5. Response To Claim Rejections Under 35 USC §103(a) As Being Obvious Over Gallant In View Of Hedin

Claims 2, 6-7 and 9-10 were rejected under 35 USC § 103(a) as being unpatentable over Gallant in view of Hedin et al (US 2004/0073685.) The Examiner states that Gallant does not teach the limitation, "at least one proxy comprises at least two proxies" but this limitation is disclosed by Hedin. (Office Action, page 15.) Claims 2, 6-7 and 9-10 depend from claim 1. As discussed above, claim 1 was amended to include the limitations, "at least some of the plurality of clients each have a SIP uniform resource identifier and a telecommunications uniform resource identifier" and "wherein, the SIP proxy receipts the communications from the plurality of clients and determines if the communications uses the SIP uniform resource identifier or the telecommunications uniform resource identifier." The applicant submits that these limitations are also not disclosed or suggested by Hedin. For the reasons discussed above in claim 1, the

applicant submits that claims 2, 6-7 and 9-10 are not obvious over Gallant in view of Hedin. Applicant requests that the rejection of these claims be withdrawn and these claims be allowed to issue.

Claim 8 was rejected under 35 USC §103(a) as being unpatentable over Gallant and Hedin with Official Notice. Claim 8 includes the limitation wherein a wireless coverage area as corresponds to the region at least partially overlaps with a wireless coverage area as corresponds to the second region. The Examiner argues that this limitation is well known in the art. Claim 8 depends from claim 1 and for the same reasons discussed above with respect to claims 2, 6-7 and 9-10, the applicant submits that claim 8 is not obvious over Gallant in view of Hedin. Applicant requests that the rejection of claim 8 be withdrawn and the claim be allowed to issue.

6. Response To Claim Rejection Under 35 USC §103(a) As Being Obvious Over Gallant In View Of Zmolek

Claim 28 was rejected under 35 USC §103(a) as being unpatentable over Gallant in view of Zmolek (US 2003/154293). Claim 28 depends from claim 1 and adds the limitation “wherein the at least one SIP proxy further comprises presence means for supporting presence within the system, at least in part, by supporting SIP/SIMPLE messages.” The examiner states that this limitation is disclosed by Zmolek (Office Action, page 18.) Claim 28 depends from claim 1 and for the same reasons discussed above with respect to claim 1, the applicant submits that claim 28 is not obvious over Gallant in view of Zmolek. Applicant requests that the rejection of claim 28 be withdrawn and the claim be allowed to issue.

7. Response To Claim Rejection Under 35 USC §103(a) As Being Obvious Over Gallant In View Of Grabelsky

Claim 32 was rejected under 35 USC §103(a) as being unpatentable over Gallant in view of Grabelsky et al (US 2004/0249951). Claim 32 depends from claim 29 and adds the limitation “providing the at least one SIP proxy with a system name having a domain name portion that is different than any domain name as is assigned to any of the plurality of clients.” Claim 32

depends from claim 29. As discussed above, claim 29 includes the limitations of at least one of the plurality of clients has at least a SIP uniform resource identifier and a telecommunications uniform resource identifier by which to identify itself, when receiving a SIP communication from the at least one of the plurality of clients that uses a SIP uniform resource identifier, automatically facilitating the SIP communication for that client; when receiving a telecommunications communication from the at least one of the plurality of clients that uses the telecommunications uniform resource identifier, automatically facilitating the telecommunications communication for that client. The applicant submits that these limitations are not disclosed or suggested by Gallant or Grabelsky. For these reasons, claim 32 is not obvious over Gallant in view of Grabelsky. Applicant requests that the rejection of claim 32 be withdrawn and claim 32 be allowed to issue.

8. Response To Claim Rejection Under 35 USC § 103(a) As Being Obvious Over Gallant In View Of Hedin And Gupta

Claim 33 was rejected under 35 USC §103(a) as being obvious over Gallant and further in view of Hedin and Gupta (US 2005/0197101). Claim 33 depends from claim 29. The applicant submits that Gallant, Hedin and Gupta do not disclose or suggest all limitations of claim 29. For these reasons, claim 33 is not obvious over Gallant in view of Hedin and Gupta. Applicant requests that the rejection of claim 33 be withdrawn and claim 33 be allowed to issue.

C. CONCLUSION

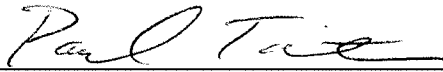
Applicant respectfully requests that the above described amendments be made part of the official record in the present application, and respectfully submit that support for the claim amendments and new claims is present in the specification, claims, and drawings as originally filed, and that no new matter has been added.

The Commissioner is hereby authorized to charge any underpayment of fees associated with this communication or credit any overpayment to Deposit Account No. 04-0822.

Respectfully submitted,
DERGOSITS & NOAH LLP

Dated: June 10, 2008

By:



Paul K. Tomita
Registration No. 43,193

Four Embarcadero Center, Suite 1450
San Francisco, CA 94111
(415) 705-6377 Telephone
(415) 705-6383 Facsimile